IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No. 04-330-KAJ
	:	
ELWOOD S. KNIGHT, MILDRED M. KNIGHT, and ELWOOD S. KNIGHT TRUSTEE OF THE KNIGHT 1995 IRREVOCABLE TRUST,	:	
	:	
Defendant.	:	

STIPULATION FOR EXTENSION OF
DATES FOR DISCOVERY CUT-OFF

The parties, through the undersigned counsel, hereby stipulate and agree, subject to the approval of the Court, that:

1. The discovery cut-off date is extended by thirty days, from April 8, 2005 to April 22, 2005.

2 No other date set in the Court's Scheduling Order of November 17, 2004 will be affected.

3. The parties seek this extension of time for the following reasons. Although the deposition of defendant Elwood Knight was anticipated to last several hours, Mr. Knight, as the caretaker of his spouse, unexpectedly had to leave the deposition to attend to her.

4. Further, at the deposition, Mr. Knight agreed to provide documents arguably responsive to the government’s earlier discovery requests, which had not yet been disclosed to the United States. The United States would like an opportunity to review the documents prior to the continuation of Mr. Knight’s deposition.

5. Finally, several anticipated witnesses were unexpectedly unavailable for deposition. The United States expects to complete all remaining depositions during the week of April 18, 2005.

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For Defendants Elwood Knight, et al.

Date:________________________, 2005

BY: /s/ Patricia C. Hannigan
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For Plaintiff United States of America

Date:________________________, 2005

IT IS SO ORDERED this __________ day of ____________________________, 2005.

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HONORABLE KENT A. JORDAN
District Judge
U.S. District Court